



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact [support@jstor.org](mailto:support@jstor.org).

## MILLER MFG. CO., Inc. v. LOVING.

June 12, 1919.

[59 S. E. 591.]

1. **Master and Servant (§ 96 (1)\*)—Unlawful Employment of Minor—Proximate Cause of Injury.**—Wrongful employment of a boy over 14 and under 16, in violation of Laws 1914, c. 339, is a tort, and injury to the child occurring in the performance of his duties under the employment must be referred to the unlawful employment as the proximate cause.

[Ed. Note.—For other cases, see 17 Va.-W. Va. Enc. Dig. 745.]

2. **Master and Servant (§ 228 (2)\*)—Injuries to Servant—Contributory Negligence.**—In an action for injuries to a boy over 14 and under 16 employed by defendant in violation of Laws 1914 c. 339, the Virginia doctrine as to contributory negligence is applicable.

[Ed. Note.—For other cases, see 17 Va.-W. Va. Enc. Dig. 643.]

3. **Master and Servant (§ 95\*)—Injuries to Minor Servant—Statute.**—Where defendant's foreman employed a boy over 14, but under 16, and permitted him to be put at work at a dangerous machine with knowledge of the fact of his age and without having obtained the employment certificate required by Laws 1914, c. 339, § 3, the hiring was in violation of the act, and unlawful, and, besides subjecting defendant to fine for the offense, subjected it to liability, under Code 1904, § 2900, for damages for any injury suffered by the boy, unless contributorily negligent.

Error to Law and Equity Court of Richmond.

Action by Wilbur M. Loving, by, etc., against the Miller Manufacturing Company, Incorporated. To review judgment for plaintiff, defendant brings error. Affirmed

*R. L. Montague, Daniel Grinnan, and C. V. Meredith*, all of Richmond, for plaintiff in error.

*David Meade White*, of Richmond. and *G. B. White*, for defendant in error.

## PHENIX INS. CO. v. SHULMAN CO., Inc.

June 12, 1919

[99 S. E. 602.]

1. **Insurance (§ 115 (4)\*)—Fire Insurance—Insurable Interest—Improvements Made by Lessee.**—Lessee would have an insurable in-

\*For other cases see same topic and KEY-NUMBER in all Key-Numbered Digests and Indexes.